IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

:

ROSCOE FRANKLIN

•

Plaintiff,

•

v.

NO. 02-CV-3359

.

GE CAPITAL ASSURANCE COMPANY

:

Defendant.

:

SUPPLEMENT TO MEMORANDUM OF LAW IN OPPOSITION TO RICHARD STIPA'S MOTION FOR PROTECTIVE ORDER

Plaintiff submits this Supplement to attach Exhibits C and D which show Richard Stipa's direct involvement in GE insurance program. These documents were only produced by Sentry on September 27, 2004.

Respectfully submitted,

ROBERT J. SUGARMAN Counsel for Plaintiff

Of Counsel:

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Dated: October 19, 2004